

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DIVISION OF MICHIGAN
SOUTHERN DIVISION**

ALLIANCE ANESTHESIA, PLLC,
INSIGHT ANESTHESIA, PLLC,
INTEGRATED HOSPITAL
SPECIALISTS PC, SOUTHEAST
MICHIGAN SURGICAL HOSPITAL,
LLC, D/B/A MICHIGAN SURGICAL
HOSPITAL, D/B/A INSIGHT SURGICAL
HOSPITAL (SUSAN WRIGHT),

Plaintiffs, Case No.:
vs. Lower Case No.: 24-004209-NF

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

Adam P. Ponto (P74332)
ELIA & PONTO, PLLC
Attorneys for Plaintiffs
25800 Northwestern Highway,
Suite 850
Southfield, MI 48075
(248) 595-8579
(248) 595-8729 (fax)
aponto@eliaandponto.com

Christopher J. Scott (P65367)
SLATER SEIBERT
Attorneys for Defendant
1500 W. Big Beaver Road, Suite 250
Troy, MI 48084
(248) 509-5642
(248) 509-5510 (fax)
cscott@slaterseibert.com

NOTICE OF FILING REMOVAL

**NOTICE OF REMOVAL OF CAUSE TO THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT OF MICHIGAN, SOUTHERN
DIVISION**

VERIFICATION

CERTIFICATE OF SERVICE

NOTICE OF FILING OF REMOVAL

TO: Clerk of the Court
Wayne County Circuit Court
2 N. Woodward Avenue
Detroit, MI 48226

Adam P. Ponto (P74332)
ELIA & PONTO, PLLC
Attorneys for Plaintiffs
25800 Northwestern Highway,
Suite 850
Southfield, MI 48075

PLEASE TAKE NOTICE THAT Defendant has, this day, filed its Notice of Removal, copies of which are attached hereto, in the offices of the Clerk of the United States District Court, Eastern District of Michigan, Southern Division, at Theodore Levin United States Courthouse, 231 W. Lafayette Boulevard, Detroit, MI 48226.

SLATER SEIBERT, PLLC

By: /s/ Christopher J. Scott
Attorneys for Defendant
1500 W. Big Beaver Road, Suite 250
Troy, MI 48084
Direct Dial: (248) 509-5642
Email: cscott@slaterseibert.com
Bar No. P65367

Dated: May 14, 2024

NOTICE OF REMOVAL PURSUANT TO 28 U.S.C.A. § 1332

TO: The United States District Court
Judges of the Above Court

NOW COMES Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its undersigned attorneys, and pursuant to 28 U.S.C. § 1332, 1441 and 1446, herewith file the within Notice of Removal pursuant to said statutes for the following reasons:

1. On **March 20, 2024**, Plaintiffs Alliance Anesthesia, PLLC, Insight Anesthesia, PLLC, Integrated Hospital Specialists, PC, Southeast Michigan Surgical Hospital, LLC, d/b/a Michigan Surgical Hospital, d/b/a Insight Surgical Hospital (Susan Wright), filed a Complaint in the Wayne County Circuit Court, State of Michigan, County of Wayne, which was assigned Case No. 24-004209-NF. (Complaint, Exhibit A).
2. On **April 16, 2024**, State Farm's registered agent, Corporation Service Company, received via certified mail the attached Complaint. (Notice of Service of Process, Exhibit B).
3. In accordance with 28 U.S.C. § 1446(a), copies of all process, pleadings and orders served upon Defendant in the State Court Action – the Summons and Complaint -- are attached hereto as Exhibits A & B.

4. Upon information and belief, and as alleged in the Complaint, Plaintiffs are corporations licensed to do business in the State of Michigan. (Paragraph 1, Exhibit A).

5. State Farm is an Illinois corporation with its principle place of business in Bloomington, Illinois. Therefore, for diversity purposes, State Farm Mutual Automobile Insurance Company is a citizen of the State of Illinois.

6. The amount in controversy exceeds seventy-five thousand dollars (\$75,000.00), exclusive of interest, costs, and attorney fees. Specifically, Plaintiffs claim outstanding medical expenses totaling \$297,238.01 are owed by Defendant.

7. The above-described action is a civil action of which this Court has original jurisdiction under the provisions of Title 28, United States Code, Section 1331, and is one which may be removed to this court by Defendant pursuant to the provisions of Title 28, United States Code, Section 1441 and 1446 in that the Plaintiffs herein commenced an action against Defendant and an actual controversy exists in which the rights and legal relations of the parties must be resolved.

8. The time for filing of this Removal under the statutes of the United States has not expired and is herewith made timely.

9. Written notice of filing of this Removal has been given to all parties as required by law and is attached hereto.

10. A true and correct copy of this Removal is being filed with the Clerk of the Court for the Wayne County Circuit Court, County of Wayne, State of Michigan, as provided for by law.

11. Filed herewith and reference made hereto and made a part hereof, is a true and correct copy of all process and pleadings served upon Defendant.

WHEREFORE, Defendant prays by its undersigned counsel, that removal of the within action be effected from the Wayne County Circuit Court, County of Wayne, State of Michigan, to the United States District Court for the Eastern District of Michigan, Southern Division.

SLATER SEIBERT, PLLC

By: /s/ Christopher J. Scott

Attorneys for Defendant

1500 W. Big Beaver Road, Suite 250

Troy, MI 48084

Direct Dial: (248) 509-5642

Email: cscott@slater.seibert.com

Bar No. P65367

Dated: May 14, 2024

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DIVISION OF MICHIGAN
SOUTHERN DIVISION**

ALLIANCE ANESTHESIA, PLLC,
INSIGHT ANESTHESIA, PLLC,
INTEGRATED HOSPITAL
SPECIALISTS PC, SOUTHEAST
MICHIGAN SURGICAL HOSPITAL,
LLC, D/B/A MICHIGAN SURGICAL
HOSPITAL, D/B/A INSIGHT SURGICAL
HOSPITAL (SUSAN WRIGHT),

Case No.:

Plaintiffs,

Lower Case No.: 24-004209-NF

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

Adam P. Ponto (P74332)
ELIA & PONTO, PLLC
Attorneys for Plaintiffs
25800 Northwestern Highway,
Suite 850
Southfield, MI 48075
(248) 595-8579
(248) 595-8729 (fax)
aponto@eliaandponto.com

Christopher J. Scott (P65367)
SLATER SEIBERT
Attorneys for Defendant
1500 W. Big Beaver Road, Suite 250
Troy, MI 48084
(248) 509-5642
(248) 509-5510 (fax)
cscott@slaterseibert.com

VERIFICATION

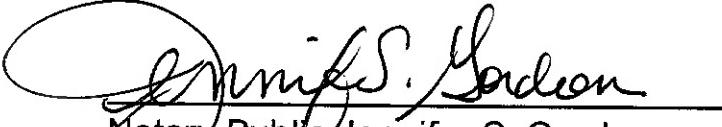
CHRISTOPHER J. SCOTT, being first duly sworn, deposes and says that he is the agent and attorney for Defendant, State Farm Mutual Automobile Insurance Company, and that the foregoing Notice of Removal is true in substance and in fact to the best of my knowledge, information, and belief.

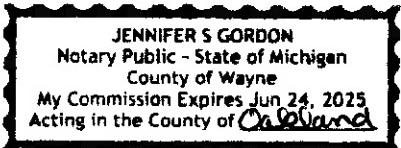
SLATER SEIBERT, PLLC

By: 
Attorneys for Defendant
1500 W. Big Beaver Road, Suite 250
Troy, MI 48084
Direct Dial: (248) 509-5642
Email: cscott@slaterseibert.com
Bar No. P65367

Dated: May 14, 2024

Subscribed and sworn to before me
on the 14th day of May, 2024.


Notary Public Jennifer S. Gordon
Wayne County, acting in Oakland County, MI
My commission expires: 06/24/2025



**UNITED STATES DISTRICT COURT
FOR THE EASTERN DIVISION OF MICHIGAN
SOUTHERN DIVISION**

ALLIANCE ANESTHESIA, PLLC,
INSIGHT ANESTHESIA, PLLC,
INTEGRATED HOSPITAL
SPECIALISTS PC, SOUTHEAST
MICHIGAN SURGICAL HOSPITAL,
LLC, D/B/A MICHIGAN SURGICAL
HOSPITAL, D/B/A INSIGHT SURGICAL
HOSPITAL (SUSAN WRIGHT),

Case No.:

Plaintiffs,

Lower Case No.: 24-004209-NF

vs.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant.

Adam P. Ponto (P74332)
ELIA & PONTO, PLLC
Attorneys for Plaintiffs
25800 Northwestern Highway,
Suite 850
Southfield, MI 48075
(248) 595-8579
(248) 595-8729 (fax)
aponto@eliaandponto.com

Christopher J. Scott (P65367)
SLATER SEIBERT
Attorneys for Defendant
1500 W. Big Beaver Road, Suite 250
Troy, MI 48084
(248) 509-5642
(248) 509-5510 (fax)
cscott@slaterseibert.com

CERTIFICATE OF SERVICE

Jennifer Gordon, an employee with the law firm of SLATER SEIBERT, PLLC being first duly sworn, deposes and says that on the 14th day of May, 2024, she caused a copy of this document to be served upon all parties of record, and that such service was made electronically upon each counsel of record so registered with the United States District Court and via U.S. Mail to any counsel not registered to receive electronic copies from the court, by enclosing same in a sealed envelope with first class postage fully prepaid, addressed to the above, and depositing said envelope and its contents in a receptacle for the US Mail.

By: /s/ Jennifer Gordon
Slater Seibert, PLLC
jgordon@slaterseibert.com